



J. Davis Law Firm, PLLC

THERE IS PROTECTION IN COUNSEL

JDAVISCOUNSEL.COM | LAW@JDAVISCOUNSEL.COM

P.O. BOX 122123, COVINGTON, KY 41011

(859) 750-5033



The Law Office of Valery Nechay
345 Franklin Street
San Francisco, CA 94102
Phone: 650-487-0671

July 5, 2024

Attn: Tricia Osborne
Mission Viejo High School
25025 Chrisanta Drive
Mission Viejo, CA 92691

NOTICE TO CEASE AND DESIST ENTICEMENT OF A CHILD FROM A PARENT

Dear Ms. Osborne,

This letter serves as a formal cease and desist notice. Our offices represent Phillip Bell Jr., along with Maria Lorna Barnes, and Anthony Barnes. Phillip Bell Jr. (biological father of Phillip Bell III), along with Maria Lorna Barnes and Anthony Barnes (biological grandparents) (collectively “the Family”) have legal custody rights to Phillip Bell III. Contrary to any opinion, Isaiah Sandoval has no legal right to parent Phillip Bell III.

This notice is issued due to your involvement in actions that may violate California Civil Code § 49. It has come to our attention that members of your staff are actively seeking housing accommodations for Phillip Bell III, without his Family’s consent. It has also come to our attention that members of your staff are actively attempting to enroll Phillip Bell III in classes for the 2024/2025 school year without his Family’s consent. Your actions have continued to promote and influence Phillip Bell III’s separation from his biological Family. This conduct is deeply concerning and must cease immediately.

If your actions and communications with Phillip Bell III do not cease immediately, the Family will be forced to take legal action. Under California Civil Code § 49, which prohibits the abduction or enticement of a child from a parent or guardian entitled to custody, you can be held civilly liable for monetary damages, including punitive damages.

Additionally, transporting or harboring a minor against the will of their parent or legal guardian is a criminal offense. There is an active court order requiring Phillip Bell III to be in Sacramento, California (Exhibit A). Any communication or action that violates this court order or promotes the furtherance of a violation of the court order, will be reported to law enforcement authorities.

We demand that you immediately cease all communications with Phillip Bell III, including, but not limited to, in-person communications, phone calls, text messages, and emails. You are hereby instructed to refrain from any and all communications with Phillip Bell III.

If you are aware of Phillip Bell III 's current whereabouts, we demand that you provide the address to us immediately.

If you are currently harboring Phillip Bell III, please immediately return him to one of the following addresses:

**120 Tehama Court
San Bruno, California 94066**

-OR-

**13236 Purvis Road
Herald, California 95638**

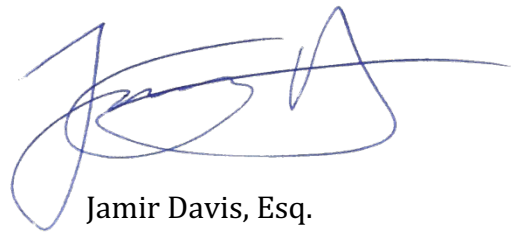
Failure to comply with this notice will result in the commencement of legal action against you. You will not receive another warning. If you do not acknowledge receipt of this letter and confirm in writing by **July 9, 2024**, that you will cease the aforementioned activities, a lawsuit will be initiated immediately. This legal action will include seeking injunctive relief, damages, and legal costs incurred due to your actions.

While this matter is pending, please be advised that Mission Viejo High School should retain and not destroy all documents, including documents in electronic and draft form, whether contained or stored on voicemail, cellular phones, personal or work laptops or computers, or servers, relating to these matters, including but not limited to personnel files regarding or relating to Phillip Bell III, documents stored or created on computer hard drive(s) (whether personal or work hard drives) and server(s); electronically-stored

information, correspondence, or documents relating or referring to our client; and documents concerning other complaints against Google. Further, Mission Viejo High School should take all necessary steps to ensure that it complies with its legal obligation to preserve all materials that may be in its possession, custody, or control and are relevant to the matters alleged in this letter. The legal duty to preserve such material extends both to hard copies of information and to electronic data, which is a valuable and irreplaceable source of discovery and/or evidence.

Please contact me at (859) 750-5033 or jdavis@jdaviscounsel.com to discuss this matter further.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Jamir Davis', with a stylized, looping flourish extending from the end.

Jamir Davis, Esq.
J. Davis Law Firm, PLLC
326 Scott Street
Covington, KY 41011
(859) 750-5033
jdavis@jdaviscounsel.com
www.jdaviscounsel.com

CC:
Valery Nechay, Esq.
The Law Office of Valery Nechay 345 Franklin St.
San Francisco, CA 94102
(415) 652-8569 valery@nechaylaw.com valerynechaylaw.com

Certificate of Service

I, Kaylah Bozman, am a citizen of the United States and I am over the age of 18 years old. On July 5, 2024, I served the within document(s) **BY US POSTAL MAIL and Email**. I placed the within document(s) in the United States Postal Mail Service addressed to Tricia Osborne at:

Tricia Osborne
Mission Viejo High School
25025 Chrisanta Drive
Mission Viejo, CA 92691

Tricia.Osborne@svusd.org

Executed on July 5, 2024.

/s/ Kaylah Bozman
Kaylah Bozman